

1 JASON M. FRIERSON  
2 United States Attorney  
3 District of Nevada  
4 Nevada Bar No. 7709  
5 VIRGINIA T. TOMOVA  
6 Assistant United States Attorney  
7 Nevada Bar Number 12504  
8 501 Las Vegas Blvd. So., Suite 1100  
9 Las Vegas, Nevada 89101  
(702) 388-6336  
Virginia.Tomova@usdoj.gov

10 *Attorneys for Federal Defendants*

11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 CRISTIANO AMPARO, an individual;  
14 ABEL MILLARES-ROJAS; an individual,

15 Plaintiffs,

16 v.

17 LEROY ROLDAN, an individual;  
18 RYDER TRUCK RENTAL LT.; a Florida  
corporation; UNITED STATES OF  
AMERICA *ex rel* UNITED STATES  
POSTAL SERVICE; DOE I through X;  
and ROE CORPORATIONS I through X,

19 Defendants.

20 Case No. 2:24-cv-00394-JAD-BNW

21 **Stipulation for Extension of Time to File**  
**Discovery Plan and Scheduling Order**  
**(First Request)**

22 The Federal Defendants, the United States of America and LeRoy Roldan, and  
23 Plaintiffs, Cristiano Amparo, and Abel Millares-Rojas, stipulate (i) to extend the time to  
24 file a discovery plan and scheduling order after the Plaintiffs' file their Amended  
25 Complaint on or before April 29, 2024, after the Federal Defendants file a responsive  
pleading on or before May 27, 2024. ECF No. 13. After the responsive pleading is filed,  
the parties will conduct the Rule 26(f) conference on or before June 17, 2024. The current  
deadline to file a discovery plan and scheduling order is April 25, 2024. ECF No. 14.

26 Therefore, the parties request that the Court extend the deadline for the parties to  
27 file a discovery plan and scheduling order pursuant to **Monday, July 1, 2024**, which will  
28 be 14 days after the parties conduct Rule 26(f) conference.

1        This stipulated request is filed in good faith and not for the purposes of undue  
2 delay.

3        Respectfully submitted this 19th day of April 2024.

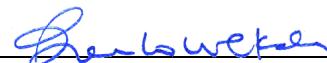
4        THE LAW FIRM OF PARKE  
5        ESQUIRE

6        JASON M. FRIERSON  
7        United States Attorney

8        */s/ Kurt C. Lambeth, Esq.*  
9        KURT C. LAMBETH, ESQ.  
10      Nevada Bar No. 6390  
11      3111 South Maryland Parkway  
12      Las Vegas, Nevada 89109  
13      *Attorneys for Plaintiffs*

14        */s/ Virginia T. Tomova*  
15        VIRGINIA T. TOMOVA  
16        Assistant United States Attorney

17        **IT IS SO ORDERED:**

18          
19        **UNITED STATES MAGISTRATE JUDGE**

20        **DATED:** 4/23/2024